

February 2022

PRIVACY NOTICE FOR STUDY ON THE FUTURE OF IMS

1. DESCRIPTION OF THE PROCESSING OPERATION

Irregularity Management System (IMS) is an IT tool that allows the reporting of irregularities by 34 countries (EU Member States, candidate countries and certain third countries). It currently covers the following funding areas: Agriculture, Cohesion (including the European Globalisation Adjustment Fund (EGF) and the European Aid to the Most Deprived (FEAD)), Asylum and Internal Security Fund (ISF), Fisheries, Neighbourhood, Pre-accession and the Recovery and Resilience Facility (RRF).

In the perspective of the need for a better interoperability between IT tools at EU and Member State level, OLAF has launched a study on the future of IMS.

In this context, the study is conducted by collecting views of all stakeholders (users, potential users, EU staff and political stakeholders); the participation to the study is purely on a voluntary basis.

The study is performed by a processor: Deloitte on the behalf of OLAF (controller unit C1).

During the study, names, professional roles / functions, professional email addresses and opinions/contributions will be collected to organise the interviews, workshops and surveys. In addition, recording of the interviews and workshops will be done with the consent of the participants in order to facilitate the drafting of the minutes and the study. The contributions of the participants are part of minutes and consequently subject to modifications by the participants before adoption.

Personal data will be processed only for the purpose of the study and will be consequently deleted after the acceptance of the deliverable.

The processing of the data will not be used for an automated decision making, including profiling.

2. LEGAL BASIS FOR THE PROCESSING

The legal basis for this processing is Article 5 paragraph d) the data subject has given consent to the processing of his or her personal data for one or more specific purposes of Regulation (EU) 2018/1725.

3. CATEGORIES OF PERSONAL DATA COLLECTED

In order to carry out this processing operation OLAF collects the following categories of personal data:

- Names, professional roles / functions and professional email addresses are collected for organisational purpose. This information originates from IMS for users, from organigrams and Email directory for EC staff member and from reports and websites for ECA staff member and Members of European Parliament.
- Opinions / contributions provided by the participants.
- Recording of the interviews and workshops

The participants contribute on a voluntary basis. The participants provide their data in the process of interviews and workshops if they consent to participate.

The consent for recording is asked before its activation at the beginning of each interview/workshop. The participants consented by participating.

4. WHO HAS ACCESS TO YOUR INFORMATION AND TO WHOM IS IT DISCLOSED?

OLAF staff responsible for carrying out this processing operation has access to your personal data in addition to the staff of the processor. Your data will not be transferred further.

5. HOW DO WE PROTECT AND SAFEGUARD YOUR INFORMATION?

In order to protect your personal data, a number of technical and organisational measures have been put in place by the processor and the controller. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the data being processed. Organisational measures include restricting access to the data to authorised persons with a legitimate need to know for the purposes of this processing operation.

6. HOW LONG DO WE KEEP YOUR DATA?

Your personal data may be retained by OLAF and the processor until the completion of the study. It will be deleted immediately thereafter.

7. WHAT ARE YOUR RIGHTS AND HOW YOU CAN EXERCISE THEM?

You have the right to request access to your personal data, rectification or erasure of the data, or restriction of their processing.

You have consented to provide your personal data to OLAF and the processor in the frame of the study. You can withdraw your consent at any time by notifying the controller. The withdrawal will not affect the lawfulness of the processing before the consent was withdrawn.

Any request to exercise one of those rights should be directed to the Controller (OLAF-FMB-DATA-PROTECTION@ec.europa.eu). Where you wish to exercise your rights in the context of one or several specific processing operations or files, please provide their description and reference(s) in your request.

Exceptions based on Regulation 2018/1725 may apply.

8. CONTACT DETAILS OF THE DATA PROTECTION OFFICER

You may contact the Data Protection Officer of OLAF (OLAF-FMB-DPO@ec.europa.eu) with regard to issues related to the processing of your personal data under Regulation(EU)2018/1725.

9. RIGHT OF RECOURSE

You have the right to have recourse to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation(EU)2018/1725 have been infringed as a result of the processing of your personal data by OLAF.